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22 *Andrew Pascal, Edward King, Daniel Fetters,*
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24 *Andrew Zobler, Sam Kennedy, Christopher Grove,*
25 *William J. Hornbuckle, Joe Horowitz,*
26 *Jason Krikorian, and Judy K. Mencher*

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

18 CHRISTIAN A. FELIPE, individually as
19 administrator of the CHRISTIAN A. FELIPE
20 CONTRIBUTORY IRA, and on Behalf of
21 Similarly Situated Persons,

22 Plaintiff,

23 vs.

24 PLAYSTUDIOS, INC. *et al.*,

25 Defendants.

26 Case No.: 2:22-cv-01159-RFB-NJK

27 **STIPULATION AND [PROPOSED]
28 ORDER TO EXTEND DEADLINE TO
FILE PROPOSED DISCOVERY PLAN
AND SCHEDULING ORDER AND TO
ANSWER**

(FIRST REQUEST)

1 Lead Plaintiffs The Phoenix Insurance Company Ltd. and The Phoenix Provident Pension
 2 Fund Ltd. (“Lead Plaintiffs”) and defendants PLAYSTUDIOS, Inc. (the “Company”), Andrew
 3 Pascal, Edward King, Daniel Fettters, James Murren, Zach Leonsis, Brisa Carleton, Andrew
 4 Zobler, Sam Kennedy, Christopher Grove, William J. Hornbuckle, Joe Horowitz, Jason
 5 Krikorian, and Judy K. Mencher (together, with the Company, “Defendants”), by and through
 6 their respective counsel, for good cause shown, hereby stipulate and agree to extend the deadline
 7 for the Parties to file their proposed discovery plan and scheduling order, and for Defendants to
 8 answer the Amended Complaint, as follows:

9 WHEREAS, on March 31, 2024, this Court issued an Order granting in part and denying in
 10 part Defendants’ Motion to Dismiss (ECF No. 91) (the “Order”);

11 WHEREAS, pursuant to the Order, the Parties are to submit a proposed discovery plan and
 12 scheduling order by April 12, 2024;

13 WHEREAS, in light of the Order, Defendants’ answer to the Amended Complaint is due
 14 April 15, 2024;

15 WHEREAS, counsel for Defendants will be away on a preexisting family commitment from
 16 April 6-11, 2024, and a key legal team member also recently went on maternity leave;

17 WHEREAS, in light of the Order, defense counsel’s unavailability, and to accommodate
 18 transition matters in connection with the aforementioned leave, and to afford the Parties
 19 sufficient time to meet and confer to address the issues under Rule 26 and Civil Local Rule 26-
 20 1, and to prepare a discovery plan and schedule thereunder, which is in the interests of the
 21 Parties and judicial economy given the complex nature of this proposed class action case, and as
 22 a matter of professional courtesies, counsel for the Parties have met and conferred and agree
 23 that there is good cause to (i) extend the deadline for the Parties to submit the discovery plan
 24 and scheduling order; (ii) extend the date for Defendants to answer the Amended Complaint;
 25 and (iii) set the date for initial disclosures to be exchanged and for initial discovery to begin, as
 26 agreed and set forth below:

27 ///

28 ///

1 NOW THEREFORE, IT IS STIPULATED AND AGREED, subject to the Court's approval,
2 that:

3 i. The deadline for the Parties to file a Rule 26(f) proposed discovery plan and scheduling
4 order is extended to and including Monday, April 29, 2024;
5 ii. The deadline for Defendants to answer the Amended Complaint shall be May 15, 2024;
6 iii. The deadline for the Parties to exchange initial disclosures shall be May 30, 2024;
7 iv. The extended deadlines set forth herein shall not affect the Parties' right to propound
8 initial document requests, which may begin starting on April 12, 2024.

9 Dated: April 3, 2024

10 **MUEHLBAUER LAW OFFICE, LTD.**

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Jason Krikorian, and Judy K. Mencher*

22 **IT IS SO ORDERED.**

23 
24 United States Magistrate Judge

25
26 DATED: April 4, 2024